

JUL 30 2007

Appln. No. 10/762,995
Amendment dated July 30, 2007
Reply to Office Action mailed April 4, 2007

REMARKS

Reconsideration is respectfully requested.

Entry of the above amendments is courteously requested in order to place all claims in this application in allowable condition and/or to place the non-allowed claims in better condition for consideration on appeal.

Claims 1 through 11 and 16 through 28 and 30 remain in this application. Claims 12 through 15 and 29 have been cancelled. No claims have been withdrawn or added.

Paragraphs 3 through 10 of the Office Action

Claim 16 has been rejected under 35 U.S.C. §102(e) as being anticipated by Dayan.

Claims 1 through 11, 17 through 22, 29 and 30 have been rejected under 35 U.S.C. Section 103(a) as being unpatentable over Dayan in view of Omidi.

Claims 23 through 28 have been rejected under 35 U.S.C. Section 103(a) as being unpatentable over Dayan in view of Omidi and further in view of Moroz.

Initially, with respect to claim 16, it is noted that claim 16 requires, among other requirements, "placing at least two portable devices on said charging mat" and "transferring data between said at least two portable devices through said charging mat". In the current Office Action, claim 16 is rejected on the basis of the Dayan patent, and more specifically at column 8, lines 60 through 65 and column 10, lines 1 through 8. However, it is submitted that one of ordinary skill in the art, considering the portions of the Dayan patent application, would not understand that the Dayan system includes this feature. Looking to col. 8, lines 60 through 65 of Dayan, it states:

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In yet other cases, the system may be used to transmit data over the established electrical connections, as opposed to just power. This may be achieved either by using additional contacts, or by modulating signals onto the existing power leads and adding a filter (i.e. inductor/capacitor) to separate DC supply from high speed data signals such as Ethernet signals etc.

It is submitted that nothing in this portion of the Dayan patent communicates to one of ordinary skill in the art the act of "transferring data between said at least two portable devices through said charging mat" as required by claim 16. Turning to col. 10, lines 1 through 8, Dayan states:

In some cases, the base unit may do power allocation and management, e.g. between multiple devices being powered at the same time. The functionality of the system can be divided in many ways between the pad surface and the device. The system can also provide for an adapter/device to have more than two contacts and it can do smart power routing/conversion as well. In some implementations, the surface contacts or some of them can be energized or grounded all the time (e.g. the interleaving geometry).

Again, it is submitted that this portion of the Dayan text would not communicate the act of "transferring data between said at least two portable devices through said charging mat". While Dayan discusses providing power to "multiple devices at the same time", nothing here discloses "transferring data between said at least two portable devices through said charging mat".

It is submitted that the Dayan patent does not disclose the requirements of claim 16, especially the requirement noted above.

Turning now to claim 1, it has been amended to include the requirements of claim 29, which previously depended from claim 1 and therefore does not present new issues for further searching. Claim 1 thus requires "a charge control switching circuit in communication with said plurality of conductive contacts, said charge control switching circuit being configured to determine which conductive contacts of said plurality of conductive contacts are in contact with contacts on a device positioned on

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said top planar surface and being configured to route power and modulated data to said conductive contacts determined to be in contact with contacts of the device". Claim 19 includes similar but not identical requirements. It is alleged in the rejection of the Office Action that:

Regarding claim 29, Dayan and Omid combined disclose claim 1, and Dayan further discloses a charge control switching circuit (sensing circuit 66) in communication with said plurality of conductive contacts (column 4, lines 59-64), said charge control switching circuit being configured to determine which conductive contacts of said plurality of conductive contacts are in contact with contacts on a device positioned on top planar surface and being configured to route power and modulated data to said conductive contacts determined to be in contact with contacts of the device (column 3, lines 44-53).

Turning to Dayan at col. 4, lines 59 through 64, it states there that:

In order to control power application to a multi-contact coupling system, preferably in idle state, base contacts B1 and B2 are not energized. When a load is connected to the base contacts B1 and B2, a sensing unit in the base unit detects the load and switches power to the contacts B1 and B2 based on information and properties of the load.

It is noted that this portion of the Dayan patent is discussing the switching of power between the contacts to provide power to the load that is encountered. It is submitted that this portion of Dayan patent does not disclose to one of ordinary skill in the art "a charge control switching circuit... configured to *route power and modulated data* to said conductive contacts determined to be in contact with contacts of the device" (all emphasis added). The other portion of Dayan referenced in the rejection, col. 3, lines 44 through 53, states:

The routing of current to the pairs of contacts for each active placement can be done in many ways. In some cases, a sensing circuit detects a signal that is asserted by the adaptor unit contacts when they come into contact with the base unit contacts. The sensing circuit uses this information to activate the base unit contacts that are touched by the adaptor unit contacts. In other cases, the current can be redirected to the contacts by sensing the relative position of the conductive surfaces 12 and 14. In other cases, the base unit can switch power to a

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sequence of pairs of base unit contacts until it senses that the circuit is closed with the mobile device.
Again, this portion of the Dayan patent discusses the switching of power between contacts, and not the routing of modulated data over conductive contacts. It is noted that the Omidi patent application, which is directed to sending data over a power line but does not address any routing of data over different power lines, and simply provides data over a common power line that does not require switching of power or data, as the power and data in Omidi is provided to all stations on the common power line.

It is therefore submitted that the cited patents, and especially the allegedly obvious combination of Dayan, Omidi, and Moroz set forth in the rejection of the Office Action, would not lead one skilled in the art to the applicant's invention as required by claims 1, 17 and 19.

Withdrawal of the 102(e) and §103(a) rejections of claims 1 through 11 and 16 through 28 and 30 is therefore respectfully requested.

CONCLUSION

In light of the foregoing amendments and remarks, early reconsideration and allowance of this application are most courteously solicited.

Respectfully submitted,

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